

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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	:	Civil Action No.:
DEBRA S. MINUTO and MV REALTY	:	2:23-cv-01765-KSH-LDW
GROUP LLC,	:	
	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JONATHAN KAIDEN; PARK LENDING,	:	
LLC; PARK LENDING II LLC; YONEL	:	AFFIDAVIT OF MERIT
DEVICO; TRINITY FINANCIAL	:	
ENTERPRISES, LLC d/b/a TRINITY	:	
MORTGAGE, LLC; TRINT NIXON;	:	
JOHN DOE LAWYER (a fictitious	:	
attorney whose identity is not	:	
yet known), JILLIAN MICHAELS,	:	
MIKHAIL MUDRIK, and THE AGENCY	:	
FLORIDA, LLC,	:	
	:	
Defendants.	:	
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STATE OF FLORIDA :
 : SS
COUNTY OF MIAMI-DADE :

HAL FELDMAN, being of full age, duly sworn, hereby states
under oath:

1. I am a licensed real estate broker in the State of
Florida, License Number SL3222616.

2. I have been a licensed and active real estate broker
since June 22, 2009. I specialize as a listing agent in South
Florida.

3. In the past 15 years, I have personally been involved in over 400 real estate transactions in South Florida.

4. Based upon the materials I have reviewed and the allegations set forth within the Complaint, it is my opinion that there exists a reasonable probability that the care, skill and knowledge exercised or exhibited by The Agency Florida LLC, Daniel Tzinker, and Mikhail Mudrik, fell outside the acceptable standards of care for licensed real estate brokers in the State of Florida.

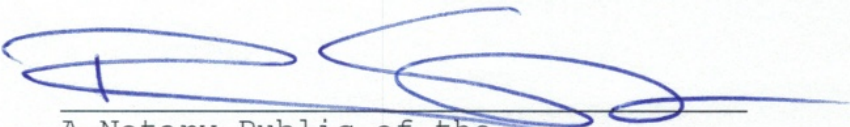
5. I have no financial interest in the outcome of the above-referenced legal proceeding. I am being compensated for my time at my normal hourly rates.

I hereby state under penalty of perjury that the foregoing statements are true and correct. I am aware that if any of the foregoing statements are willfully false, I may be subject to punishment.



HAL FELDMAN

Sworn and Subscribed to
on this 24 day of April, 2023



A Notary Public of the
State of Florida

